

1990 U.S. census, is 1,211 persons. Linn has its own post office with its own zip code, 65051. It is also the county seat of Osage County, Missouri, which has a population of 12,018 persons. It has its own police and fire departments. In addition, the Osage County Sheriff's Department is based in Linn. The educational needs of its citizens are met by the Linn R-2 school district, which instructs students in kindergarten through 12th grade. Parochial education is provided by the St. George School, while higher education needs are served by the Linn State Technical College.

Linn provides its citizens with water and sewer needs through a municipally owned water treatment plant and sewage plant. Linn has a municipal park with an additional park that is presently under construction. Medical needs for the community are provided by the Linn Family Health Care Center, as well as several independent physicians and dentists. Linn has numerous businesses, including new car dealers, banks, restaurants, grocers and video tape rental outlets.

Despite Linn's status, no broadcast facilities of any type are allocated to the community. Allocation of Channel 276A would remedy this deficiency.

As the attached engineering study demonstrates, allocation of Channel 276A to Linn can be accomplished with no site restriction and

in complete accordance with the Commission's allocation rules. Because Linn is not located in or around any urbanized area, there is no need to provide any analysis demonstrating that Linn is separate and distinct from any neighboring jurisdiction.

The allocation of Channel 276A to Linn is in the public interest. The proposal would permit Linn to receive its first local broadcast service, thereby serving the highest of the Commission's allocation priorities:

[T]here are virtually no populated areas of the country where our higher allotment priorities, such as first reception service, have not been attained. Therefore, as a practical matter, provision of first local service is the highest of our allotment priorities which remains in any significant degree unsatisfied.

Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 5 FCC Rcd 7094, 7096 (1990). In addition, the broadcast facility that could be built if this proposal is adopted would provide an additional aural reception service to a population of 30,317 persons.

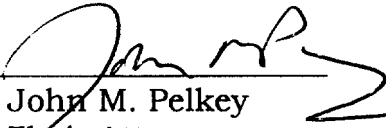
The Wheelers will apply for an authorization to construct the new facility on Channel 276A at Linn if the allocation is adopted by the Commission.

Accordingly, the Wheelers respectfully request that the Table of FM Allotments be amended as follows:

Community	Present Allotment	Proposed Allotment
Linn, Missouri	- -	276A

Respectfully submitted,

R. Lee and Sarah H. Wheeler

By: 
John M. Pelkey
Their Attorney

HALEY BADER & POTTS P.L.C.
Suite 900
4350 North Fairfax Drive
Arlington, VA 22203-1633

703/841-0606

Date: July 10, 1998



WHEELER **BROADCAST** CONSULTING

Engineering Study

Proposed Rule Making to Allocate Channel 276 A to Linn, Missouri

This consultant, on behalf of himself and his wife, is preparing an engineering statement in support of a Proposed Rule Making to amend the FM table of allotments, 47 CFR 73.202 (b), by adding Channel 276 A to Linn, Missouri as its first local service.

A full commercial channel search of the Commission's July 3, 1998 FM database was performed in order to determine the availability of an FM channel for allocation to Linn, Missouri. The study revealed that Channel 276 A could be allocated to Linn with no site restriction.

The coordinates of Linn, Missouri are listed by the United States Census Bureau as follows:

38° 28' 51" N. Latitude
91° 50' 40" W. Longitude

Channel 276 A meets all minimum spacing requirements of 47 CFR 73.207 from the coordinates of Linn and, as such, those coordinates are suitable as allocation coordinates as well. Exhibit 1 of this report is a copy of the Commission's database search confirming the proposed allocation's compliance with 47 CFR 73.207.

Exhibit 2 is a digitally generated map, generated from USGS and NGDC data, which indicates the reference site, the open area in which to locate a suitable transmitter facility, and the predicted 60 dBu contour of a model Class A at the proposed allocation site.

6025 MARTWAY
SUITE 112
MISSION, KS 66202
913.362.7282
913.362.7287

Linn, Missouri

Linn, Missouri is an incorporated city with a Mayor and City Council form of government. The population of Linn is 1211 persons according to the 1990 US Census. Linn has its own Post Office and its own, unique, Zip Code, 65051. Linn is the County Seat of Osage County, Missouri, a county with a population of 12,018 persons. Public protection is provided by the Linn Police Department, the Linn Volunteer Fire Department, as well as the Osage County Sheriff's Department which is based in Linn. Educational needs of the citizens of Linn are provided by the Linn R-2 School district which covers Kindergarten to 12th Grade. Parochial education is provided by the St. George School. Higher education is provided by the Linn State Technical College. Linn is home to a branch of the Missouri Regional Library System.

Linn provides its citizens with water and sewer needs through a municipally owned water treatment plant and sewage plant. Linn has a municipal park with an additional park that is presently under construction. Medical needs for the community are provided by the Linn Family Health Care Center as well as several independent physicians and dentists. Linn has numerous businesses including new car dealers, banks, restaurants, grocers, video tape rentals, etc.

Conclusion

Linn, Missouri is a community deserving of its first commercial FM service and the proposed Channel 276 A allocation provides that service. The reference facility would provide an additional aural service to a population of 30,317 Persons. The first local service at Linn would further provide Osage County with its first local aural service. Linn is not located in nor is it near an Urbanized Area as defined by the US Census. In light of the above facts, this proposal is clearly in the public interest and it is respectfully requested that 47 CFR 73.202(b) be amended as follows:

Community	Present	Proposed
Linn, MO	-----	276 A

Certification

All information contained in this report is true and accurate to the best of my belief. Having had numerous matters before the Commission, my qualifications are a matter of record.

7/9/98
Date

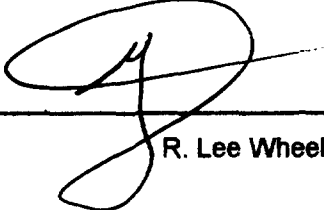

R. Lee Wheeler

Exhibit 1

WHEELER BROADCAST CONSULTING
6025 Martway - Suite 112 - Mission KS 66202

Channel 276 A
Linn, MO

REFERENCE	CLASS A	DISPLAY DATES
38 28 51 N	Current rules spacings	DATA 07-05-98
91 50 40 W	CHANNEL 276 -103.1 MHz	SEARCH 07-07-98

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KLOU	277C1	St. Louis	MO	87.2	134.88	133.0	1.88 <
LI CN	38 31 47	90 17 58	32.000 kW	153M	83.8	82.7	
		CBS, Inc.			BLH940516KY		
KLOU	277C1	St. Louis	MO	87.2	134.88	133.0	1.88 <
LI CN	38 31 47	90 17 58	100.000 kW	280M	83.8	82.7	
		CBS, Inc.			BLH6439		
KMMOFM	275C1	Marshall	MO	301.8	139.92	133.0	6.92
LI CN	39 08 03	93 13 19	100.000 kW	116M	87.0	82.7	
		Missouri Valley Broadcasting,			BLH931213KB		
KJEL	279C	Lebanon	MO	227.3	107.96	95.0	12.96
LI CN	37 49 10	92 44 51	100.000 kW	300M	67.1	59.0	
		Ozark Broadcasting, Inc.			BLH881115KC		
KJEL	279C	Lebanon	MO	220.3	115.49	95.0	20.49
LI CN	37 41 10	92 41 39	30.000 kW	79M	71.8	59.0	
		Ozark Broadcasting, Inc.			BLH960311KD		
		>auxiliary facility					
KJEL.C	279C	Lebanon	MO	220.3	115.60	95.0	20.60
CP CN	37 41 06	92 41 40	30.000 kW	79M	71.8	59.0	
		Ozark Broadcasting, Inc.			BPH980309IJ		000102
AD274	274C3	Waynesville	MO	200.2	78.22	42.0	36.22
AD	37 49 09	92 09 06	0.000 kW	0M	48.6	26.1	
		Pulaski County Broadcasters I			RM6701		
		>Counterproposal in 89-120-Pet for Recon					
KEZKFM	273C	St. Louis	MO	83.1	132.33	95.0	37.33
LI CN	38 36 47	90 20 09	14.500 kW	122M	82.2	59.0	
		Par Broadcasting Company, Inc			BLH960212KC		
		>*** This is an AUXILIARY facility for station KEZK-FM, St. Louis, M					
KEZKFM	273C	St. Louis	MO	85.1	132.90	95.0	37.90
LI CN	38 34 24	90 19 30	100.000 kW	313M	82.6	59.0	
		Par Broadcasting Company, Inc			BLH870316KB		
AD274	274A	Waynesville	MO	200.2	78.22	31.0	47.22

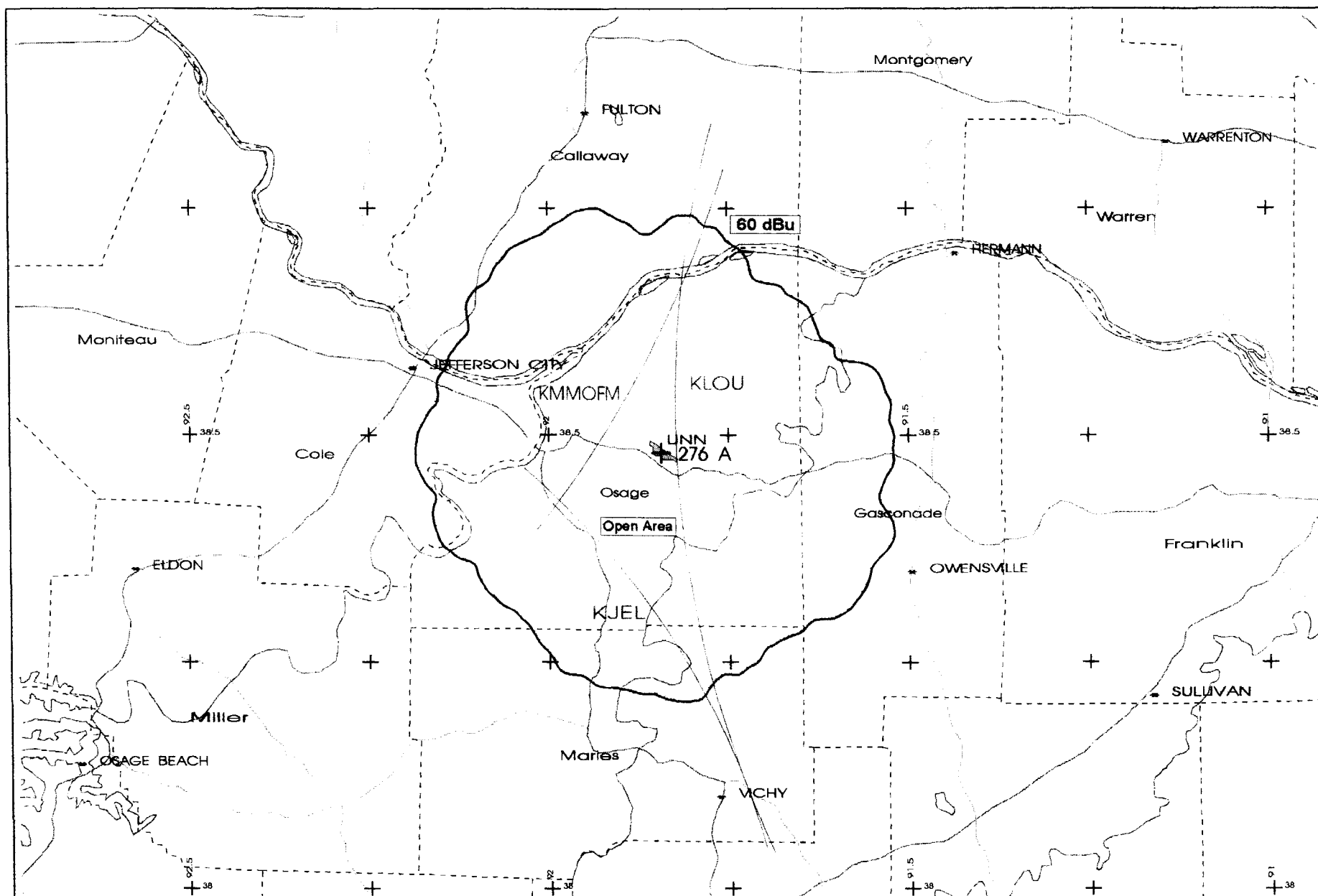
Exhibit 1

PAGE 2

WHEELER BROADCAST CONSULTING
6025 Martway - Suite 112 - Mission KS 66202

CLASS A

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD	37 49 09	92 09 06	0.000 kW	0M	48.6	19.3	
		CTC Communications, Inc.			RM6701		
		>PRM-Pet for Recon					
KQUL	274A	Lake Ozark	MO	232.4	80.88	31.0	49.88
LI CN	38 02 06	92 34 31	6.000 kW	100M	50.3	19.3	
		Reichel Broadcasting Corporat			BLH940516KZ		



Scale in km
0 10 20 30 40

Proposed Linn, MO Operation Ch. 276 A
N. Lat. 38 28 51 W. Lng. 91 50 40

EXHIBIT 2
L. WHEELER - 07/98